



January 16, 2018

Health Policy Committee
House of Representatives
P.O. Box 30015
Lansing, MI 48909

Dear Representative:

We are the Directors of Clinical Training at all eight American Psychological Association (APA)-accredited doctoral clinical psychology programs in Michigan. We are writing in strong support of Senate Bill 634, introduced by Senator Wayne Schmidt (R-Traverse City). SB 634 recently passed the Senate and was referred to the House of Representative's Healthy Policy Committee.

Collectively, our institutions graduate the majority of the psychologists who are granted doctoral psychology licenses by the Michigan Board of Psychology. The institutions are Central Michigan University, Eastern Michigan University, the Michigan School of Professional Psychology, University of Detroit-Mercy, Michigan State University, University of Michigan, Wayne State University, and Western Michigan University.

As you may know, the Department of Licensing and Regulatory Affairs (LARA) issued a policy change in early January 2017, following a routine analysis of their implementation of state statute. Please see attached memo from Kim Gaedeke, Director of the Bureau of Professional Licensing. Unfortunately, in the process of rectifying a legitimate issue, the deadline and policy change inadvertently impacted the training of our institutions' doctoral students.

The students' practicum training as well as the required pre-doctoral internship occur in both program-based clinics and external community settings, and many of these training sites require our students to be licensed to provide services. For decades, our doctoral students have applied for and obtained the Temporary Limited License in Psychology (TLLP), which allowed them to acquire this critical clinical training. The TLLP was granted for 2 years, and students were able to renew their TLLP for an additional 2-year period (and sometimes for an additional 4 years) to continue their practicum and internship training until they completed their doctorate. These renewal requests have consistently been granted by the Board of Psychology to support our students continued doctoral training. However, the new policy instituted by

LARA precludes any renewals of the TLLP, and limits the license to a single, 18-month period, pursuant to current law. This has unfortunately resulted in doctoral students from being able to retain their TLLP licensure while completing their doctoral programs.

Since the policy change implementation, our clinical training programs have worked closely with LARA, and specifically with LARA's Bureau of Professional Licensing, to ensure that our students can continue to receive their practicum and internship training in Michigan. However, the doctoral programs, doctoral students, and practicum and internship training sites are faced with a December 31st deadline. In less than 3 months, our doctoral students will be confronted with the possible loss of numerous Michigan training sites, necessitating students to find practicum and internship training *outside the state of Michigan*. Furthermore, we believe the loss of doctoral students will negatively impact both the training sites and the many Michigan residents whom TLLP students serve.

It is our understanding that the legislature, through other measures, is moving forward with a long-term solution developing a psychology licensing structure. However, we believe that Senate Bill 634 provides a necessary solution for the immediate issue by allowing the TLLP to be renewed for doctoral students enrolled in all of the APA-accredited doctoral clinical psychology training programs in Michigan. We have engaged with the Bureau of Licensing Professionals throughout this process; they have provided critical support in drafting a legislative fix and are strongly supportive of the changes proposed in SB 634.

Again, we respectfully request your support of Senate Bill 634. If you have any concerns or questions, the eight accredited doctoral program directors are positioned to engage at any time.

Sincerely,

Clinical Training Directors of APA-accredited
Michigan Doctoral Programs in Clinical Psychology

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Enc.:

- **Kim Gaedeke memo to TLLP licensees-January 2017**
- **Directors of APA-accredited Michigan Doctoral Clinical Psychology Training Programs response from January 2017**
- **A timeline for TLLP use for Masters & Doctoral programs**

